

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143
Honorable T.S. Ellis, III
Trial: Oct. 19, 2021

DEFENDANT'S NOTICE OF FILING

Defendant, Zackary Ellis Sanders, by counsel, submits the attached notice of filing of portions of chats from what has been previously identified by Special Agent Christopher Ford as government exhibit 501. The defense proposes to question Special Agent Ford regarding the portions below.

GX 501 at 18 – NOT YET ADMITTED

4/28/17 7:18PM-7:29PM

GX 501 at 21 – NOT YET ADMITTED

4/29/17 3:50PM-3:53PM

GX 501 at 22 – NOT YET ADMITTED

4/29/17 4:03 PM-4:13PM

GX 501 at 32 – NOT YET ADMITTED

4/29/17 10:44 PM-10:48PM

GX 501 at 35 – NOT YET ADMITTED

4/29/17 11:55 PM to 4/30/17 12:07AM

GX 501 at 40 – NOT YET ADMITTED

4/30/17 5:09 PM-5:14PM

GX 501 at 99 – NOT YET ADMITTED

5/9/17 1:11 PM-1:28PM

GX 501 at 100 – NOT YET ADMITTED

5/9/17 1:46 PM

Evidence regarding portions of these chats between Mr. Sanders and alleged minor victim 5 should be permitted under the rule of completeness and in order to demonstrate that Mr. Sanders's predominant, significant, or motivating purpose in employing, using, persuading, inducing, enticing, or coercing any of the alleged minor victims to engage in sexually explicit conduct was not to produce a visual depiction of that conduct.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of October 2021, the foregoing was served electronically on the counsel of record through the US District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress

Jonathan Jeffress